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December 23, 2016

VIA NLRB E-FILING

Gary Shinnars
Executive Secretary
National Labor Relations Board
1015 Half Street
Washington, DC 20570-0001

Re: Cablevision Systems Corp.
29-RD-138839
KM&M File No. 10464-0058

Dear Mr. Shinnars:

We are in receipt of the letter from Gabrielle Semel, Esq., counsel for the Communications Workers of America ("CWA"), dated December 23, 2016, seeking an extension of time of 21 days to submit a Statement in Opposition to the Request for Review filed by the Employer, Cablevision Systems Corp., in the referenced matter.

The Employer strongly opposes what is a transparent and cynical attempt by the CWA to further delay the disposition of this decertification proceeding. The petition for decertification was filed in October 2014, substantially more than two years ago. The CWA has used every opportunity to delay the disposition of what is contemplated by the Act and by Board law to be an expeditious proceeding. As a result, the employees in the bargaining unit have, for far too long, been denied their Section 7 rights to express their desires regarding representation in a secret ballot election.

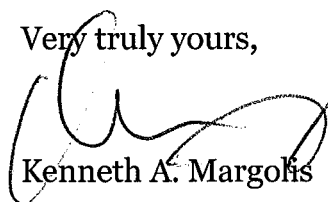
We observe that, recently, in a separate matter, Case 02-RC-189582, the Employer requested an adjournment of *only two days* in the initially scheduled date for a representation hearing. As the attached correspondence reveals, the CWA passionately opposed that request. Apparently, where a matter involves an attempt by the CWA to *obtain* representative status as opposed to, as in this case, an effort by bargaining unit employees to exercise their right to vote to *remove* that status, the CWA has a far different view of the urgency of the proceeding.

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Moreover, the fact that Ms. Semel will be on vacation for several days does not justify the lengthy extension, particularly because CWA, a major labor organization, has many other attorneys who are familiar with this proceeding and who could easily address the Request for Review within the required time.

For the foregoing reasons, the Employer respectfully urges that the requested extension be denied.

Very truly yours,



Kenneth A. Margolis

cc: Gabrielle Semel, Esq.
Kathy Drew-King
Tiffany Oliver

From: Sumanth Bollepalli [<mailto:sbollepalli@cwa-union.org>]

Sent: Thursday, December 15, 2016 12:57 PM

To: Stephen.Berger@nrlrb.gov

Cc: Silverstein, Harlan <silverstein@kmm.com>

Subject: 2-RC-189582

Dear Mr. Berger:

CWA objects to Cablevision's request for a two day postponement of the hearing and filing date for the Statement of Position in the above-referenced representation case.

The petition was filed and served on the Employer, Cablevision, on December 9, 2016, ten days before the current hearing date of December 19, 2016. Cablevision has had more than enough time to retain counsel and familiarize itself with any issues that may exist. Moreover, Cablevision retained counsel who is very familiar with the proposed unit of employees at the Bronx location in this matter. Counsel's law firm, Kauff, McGuire & Margolis LLP, currently represents Cablevision in unfair labor practice proceedings, including 02-CA-138301, 02-CA-138302 and 02-CA-138303. All of these involve OSP technicians who were employed in the Bronx prior to the alleged unlawful transfers at issue in those cases. Counsel's law firm has also represented Cablevision in prior representation matters before the Board, including 2-RC-081294 (which involved a nearly identical unit of technicians at the Bronx location), 2-RC-082138 (also involving the Bronx location) and 29-RC-070897 (which involved a nearly identical unit of technicians at the Brooklyn location) as well as several other unfair labor practice proceedings, including 02-CA-085811 (involving unfair labor practices that occurred at the same Bronx location during a prior union organizing drive) and 29-CA-134419.

Based on counsel and/or his law firm's familiarity with the Bronx and Brooklyn operations and job classifications due to involvement in various unfair labor practices, union organizing drives and election petitions involving nearly identical units of technicians, counsel has failed to establish that special circumstances exist for a two-day postponement. While counsel may not be available, other attorneys in counsel's law firm have also been involved in the above-referenced Board proceedings, who are equally familiar with these issues.

Your attention to this matter is greatly appreciated.

Sincerely,

Sumanth Bollepalli

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